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19

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 MICHAEL J. FLYNN, WILLIAM SHERIDAN,
23 MICHAEL TABB, and PHILIP STILLMAN,

24 Case No.: 3:19-cv-239-MMD-CBC

25 **STIPULATION AND [PROPOSED] ORDER**
26 **EXTENDING TIME FOR DEFENDANTS TO**
27 **RESPOND TO FIRST AMENDED**
28 **COMPLAINT**

29 **(First Request)**

30 Plaintiffs,

31 v.

32 MICHAEL LOVE, an individual; and
33 JACQUELINE LOVE, an individual, and DOES
34 1-10

35 Defendants.

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1 IT IS HEREBY STIPULATED AND REQUESTED by and between Plaintiffs Michael J.
2 Flynn, William Sheridan, Michael Tabb, and Philip Stillman, proceeding in *pro se*, and Defendants
3 Michael Love and Jacquelyn Love¹, through their counsel of record, Greenberg Traurig, LLP, and
4 pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, that the Court extend the deadline for
5 Defendants to respond to Plaintiffs' First Amended Complaint by 30 days, up to, and including,
6 **October 25, 2019**. This stipulation is made and based upon the following.

7 1. Plaintiffs filed their original Complaint on May 10, 2019, listing Jacqueline Love,
8 only, as a Defendant. ECF No. 1.

9 2. Plaintiffs then filed their First Amended Complaint on July 25, 2019, listing both
10 Jacqueline Love and Michael Love as Defendants. ECF No. 5.

11 3. Defendants waived service of the First Amended Complaint and proof of the same
12 was filed on August 6, 2019. ECF Nos. 7, 8. The due date for Defendants' Answer or responsive
13 pleading was set by the Court for September 26, 2019. *Id.*

14 4. Simultaneously, the parties are proceeding with non-binding arbitration in front of
15 the San Diego County Bar Association ("SDCBA"). An arbitration panel has not been selected or
16 assigned and an arbitration date is not yet set.

17 5. As both Michael Love and Jacquelyn Love will be present at the non-binding
18 arbitration, which may narrow the issues of dispute between the parties, the parties hereby stipulate
19 and request that the Court extend the deadline for Defendants to file their Answer or other
20 responsive pleading to October 25, 2019. The parties are hopeful that this extension will provide
21 them an opportunity to proceed to arbitration before the SDCBA and settle the matter without the
22 necessity for litigation.

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¹ Incorrectly named as Jacqueline Love.

1 6. This is the first request for an extension of time to respond by Defendants, and it is
2 made in good faith and not for purposes of delay.

3 | Dated this 13th day of September 2019.

Dated this 13th day of September 2019.

5 /s/ Michael Tabb
6 MICHAEL J. FLYNN, ESQ.
7 WILLIAM SHERIDAN, ESQ.
8 MICHAEL TABB, ESQ.
9 PHILIP STILLMAN, ESQ.

Plaintiffs in pro se

/s/ Jason Hicks
VINCENT H. CHIEFFO, ESQ.
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MARK E. FERRARIO, ESQ.
Nevada Bar No. 1625
JASON K. HICKS, ESQ.
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Counsel for Defendants

IT IS SO ORDERED.

W. J. Dunn
UNITED STATES MAIL

UNITED STATES MAGISTRATE JUDGE

Dated this 8th day of September 2019.

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